

UNITED STATES DISTRICT COURT
for the
Southern District of Indiana

United States of America)
v.)
) Case No.
) 1:21-mj-00010
KRISTOPHER EDWARDS)
)
Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 20, 2020 in the county of Marion in the
Southern District of Indiana, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922 (g)(1)	Felon in Possession of a Firearm

This criminal complaint is based on these facts:

See Attached Affidavit

Continued on the attached sheet.

/s/ Aaron Carter

Complainant's signature

Aaron Carter, ATF

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by
telephone (*reliable electronic means*)

Date: 1/7/2021

City and state: Indianapolis, Indiana


Debra McVicker Lynch
United States Magistrate Judge
Southern District of Indiana

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR CRIMINAL COMPLAINT**

I, Aaron J. Carter being duly sworn, depose and states:

1. I am a Police Officer with the Indianapolis Metropolitan Police Department (IMPD) as defined in I.C.35-41-1-17(a), and have been so employed since 2001. In addition, I am a federally sworn Tasks Force Officer (TFO) with the Bureau of Alcohol Tobacco Firearms and Explosives (ATF). During my tenure as an officer, I have participated in numerous criminal investigations. I have received extensive training and experience in the conduct of criminal investigations, and those matters involving Firearms and the trafficking of narcotics.

2. During my employment with the IMPD, I have conducted and participated in many investigations involving violations of both State and Federal laws relating to firearms and narcotics. I have participated in the execution and numerous federal and state arrest warrants in such investigations. I have had extensive training in many methods used to commit acts of violence contrary to both laws of the State of Indiana and the United States Government.

3. This affidavit is in support of an application for a complaint charging Kristopher J. EDWARDS of Indianapolis Indiana for possession of a firearm by a convicted felon, in violation of Title 18, United States Code, Section 922(g)(1). This affidavit is based upon my personal involvement in this investigation, my training and experience, my review of relevant evidence, and information supplied to me by other law enforcement officers. It does not include each and every fact known to me about the investigation, but rather only those facts that I believe are sufficient to establish the requisite probable cause.

FACTS AND CIRCUMSTANCES

4. On December 20, 2020 at approximately 3:58 PM, Officer Nicholas Snow with the Indianapolis Metropolitan Police Department, while in a fully marked police vehicle and in full police uniform, observed a black small passenger vehicle travel west bound on 30th Street from Harding Street. Officer Snow observed the vehicle to be traveling at a high rate of speed but was unable to pace the vehicle. Officer Snow then observed the vehicle fail to use a turn signal within 200 feet as the vehicle changed lanes from the number one lane to the west bound turn lane onto West 30th Street. Officer Snow also observed the vehicle fail to signal as it turned onto 30th Street from the 30th/29TH Street interchange. Officer Snow activated his emergency lights and siren and initiated a traffic stop in the 3000 block of North White River Parkway West Drive.

5. Officer Snow approached the vehicle from the driver's side and made contact with the driver and sole occupant, who was later identified as Kristopher J. EDWARDS. Officer Snow immediately detected the odor which he knows through his training and experience to be raw marijuana emitting from the interior of the vehicle. Officer Snow retrieved a driver's license from EDWARDS and asked EDWARDS to exit his vehicle, to which he complied.

6. Due to the odor of marijuana emitting from the interior of the vehicle, Officer Snow began a search of the vehicle. Officer Snow located a black backpack on the front passenger seat. Under the black backpack Officer Snow located a Planters peanut container which contained approximately \$60.00 in small denominations. Officer Snow also located directly next to the Planters container a white container which contained two (2) white circular pills stamped, "10 325 RP". These pills were later identified as oxycodone. He also found other multi-colored

pills which Officer Snow knows through his training and experience to be ecstasy with a possible methamphetamine base.

7. Officer Snow then searched the inside of the black backpack. Upon shaking the backpack, Officer Snow observed a black handgun fall from the backpack and onto the front passenger seat. Officer Snow secured the firearm and observed a loaded magazine with no round in the chamber. The firearm was identified as a Springfield Armory, model XD 9mm with serial number, MG702589. The firearm was not manufactured in Indiana and as result would have traveled through interstate or foreign commerce to arrive in the state.

8. Officer Snow placed the firearm into a firearms box and continued searching the backpack where the firearm fell out. Officer Snow located a pill bottle at the bottom of the backpack and observed the bottle be prescribed to Kristopher EDWARDS. Officer Snow located multiple pills of Xanax, oxycodone and additional multicolored pills which Officer Snow knows through his training and experience to be ecstasy with a possible methamphetamine base. Officer Snow also observed a glass mason jar which contained a green leafy substance which Officer Snow knows through his training and experience to be raw marijuana.

9. Officer Snow conducted a taped interview on body camera with EDWARDS after advising him of his *Miranda* rights. EDWARDS stated the firearm was his and that he had recently touched it as he was moving out of his girlfriend's residence. EDWARDS stated the firearm was gifted to him by his family. EDWARDS stated the multicolored pills were sold to him that day at a gas station for \$30.00. EDWARDS stated he buys Xanax to supplement his own prescription of alprazolam. Officer Snow later located additional money in EDWARDS wallet bringing the total to \$218.00. Officer Snow asked EDWARDS if the vehicle was his and if he usually drives that vehicle to which EDWARDS replied yes.

10. EDWARDS has the following felony convictions on his record: (1) Legend Drug Deception, under Hendricks County, Indiana cause number 32C01-1612-F6-001191, on or about March 06, 2017, (2) Theft, under Hendricks County, Indiana cause number 32C01-1612-F6-001191, on or about March 06, 2017, and (3) Theft of a Firearm, under Hendricks County, Indiana cause number 32C01-1609-F6-000896, on or about December 12, 2016.

11. All events occurred in Marion County, Southern District state of Indiana.

CONCLUSION

12. Based on the foregoing, there is probable cause to believe that on or about December 20, 2020, KRISTOPHER J. EDWARDS committed the offense of possession of a firearm by a convicted felon, in violation of Title 18, United States Code, Section 922(g)(1). I respectfully request this Court issue a Criminal Complaint charging EDWARDS accordingly, along with a warrant for his arrest.

/s/ Aaron J. Carter

Aaron J. Carter
Task Force Officer
Bureau of Alcohol, Tobacco, Firearms, and Explosives

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

1/7/2021



Debra McVicker Lynch
United States Magistrate Judge
Southern District of Indiana